

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERONICA KARIUKI)
)
Plaintiff,)
) Civil Case No.: 1:15-cv-00934-TSE-JFA
v.)
)
ETEAM, INC.)
)
)
Defendant.)
)

PLAINTIFF VERONICA KARIUKI'S EXPERT WITNESS DISCLOSURE

Plaintiff Veronica Kariuki (hereinafter "Plaintiff"), by counsel, General Counsel, P.C., and pursuant to Federal Rules of Civil Procedure Rule 26(a)(2) and the Scheduling Order, serves the following expert witness disclosure:

Joseph Migliozzi
M3 Technology Consultants, Inc.
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Mr. Joseph Migliozzi is an expert in the field of Information Technology. His testimony will be based on his education and experience in Information Technology, and on his review of the e-mail at issue as well as any metadata associated with the e-mail. He will opine on the metadata of the e-mail, the origins of the e-mail, and the authenticity of the e-mail. For further information, see attached Expert Witness Report.

Dr. Sumitra Easwaran
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Dr. Sumitra Easwaran was Plaintiff's primary care physician at Kaiser Permanente. Her testimony will be based on her medical training, her medical expertise and experience in treating patients similar to the Plaintiff, her examination and knowledge of the Plaintiff, and her review of the Plaintiff's medical reports and bills. Dr. Sumitra Easwaran will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. She will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff.

Dr. John Lee
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Dr. John Lee was Plaintiff's sub primary care physician at Kaiser Permanente. His testimony will be based on his medical training, his medical expertise and experience in treating patients similar to the Plaintiff, his examination and knowledge of the Plaintiff, and his review of the Plaintiff's medical reports and bills. Dr. John Lee will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. He will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff.

Dr. Rajeev Verma
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Dr. Rajeev Verma was Plaintiff's Psychiatrist at Kaiser Permanente. His testimony will be based on his medical training, his medical expertise and experience in treating patients similar

to the Plaintiff, his examination and knowledge of the Plaintiff, and his review of the Plaintiff's medical reports and bills. Dr. John Lee will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. He will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff. Finally, he will testify that Plaintiff suffered from depression, that he prescribed her Fluoxetine Prozac to treat her depression, and that the depression stemmed in part from the e-mail she received from Defendant eTeam, Inc.

Julie Isaacs, Licensed Clinical Worker
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Ms. Julie Isaacs was Plaintiff's clinical worker at Kaiser Permanente. Her testimony will be based on her clinical training, her clinical expertise and experience in treating patients similar to the Plaintiff, her examination and knowledge of the Plaintiff, and her review of the Plaintiff's medical/clinical reports and bills. Ms. Julie Isaacs will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. She will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff. Finally, she will testify that Plaintiff suffered from depression at that time and that the depression stemmed in part from the e-mail she received from Defendant eTeam, Inc.

Regina McCombs, Licensed Clinical Worker
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Ms. Regina McCombs was Plaintiff's clinical worker at Kaiser Permanente. Her testimony will be based on her clinical training, her clinical expertise and experience in treating patients similar to the Plaintiff, her examination and knowledge of the Plaintiff, and her review of the Plaintiff's medical/clinical reports and bills. Ms. Julie Isaacs will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. She will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff. Finally, she will testify that Plaintiff suffered from depression at that time and that the depression stemmed in part from the e-mail she received from Defendant eTeam, Inc.

Dr. John Youk
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Dr. John Youk was Plaintiff's primary care physician at Reston Hospital/Inova Hospital. His testimony will be based on his medical training, his medical expertise and experience in treating patients similar to the Plaintiff, his examination and knowledge of the Plaintiff, and his review of the Plaintiff's medical reports and bills. Dr. John Lee will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. He will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff.

Dr. Sheena Abraham
c/o General Counsel, P.C.
6849 Old Dominion Drive, Suite 220
McLean, Virginia 22101

Dr. Sheena Abraham is Plaintiff's current primary care physician. Her testimony will be based on her medical training, her medical expertise and experience in treating patients similar to the Plaintiff, her examination and knowledge of the Plaintiff, and her review of the Plaintiff's medical reports and bills. Dr. Sumitra Easwaran will opine on the damages the Plaintiff suffered, the causation of the Plaintiff's damages, and that the damages the Plaintiff suffered are directly related to and caused by the Defendant's actions. She will also opine on the reasonableness and necessity of all medical treatment Plaintiff received and the medical bills charged to the Plaintiff.

Respectfully submitted,

/s/ J. Andrew Baxter
J. Andrew Baxter
Merritt J. Green
Connie M. Ng
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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2015, I filed the foregoing Plaintiff's Expert Disclosure with the Clerk of the Court using CM/ECF, which will send a notice of electronic filing (NEF) to all registered users listed below:

CARL MALONEY P.C.
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/s/ J. Andrew Baxter

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